

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165
T: 212.792-0048 • E: Jason@levinepstein.com

September 14, 2023

Via Electronic Filing

The Honorable Robert M. Levy, U.S.M.J.
U.S. District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Torres v. Maman Group New York Corp. et al*
Case No.: 1:22-cv-05029-LDH-RML

Dear Honorable Magistrate Judge Levy:

This law firm is counsel to Plaintiff Alejandro Torres (the “Plaintiff”) in the above-referenced matter. The following letter is submitted jointly with counsel for Defendants Maman Group New York Corp. and Maman Tribeca, LLC (together, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, this joint letter respectfully serves to request an extension of time to complete fact discovery from September 14, 2023 to, through and including, October 31, 2023.

This is the second request of its kind. [*See* Dckt. No. 20; 06/20/2023 Order]. If granted, this request would also necessitate an adjournment of the telephonic status conference scheduled for September 26, 2023 to a date and time after October 31, 2023.

The basis of this request is that the parties have not yet been able to conduct a virtual mediation in this action. By way of background, a virtual mediation was scheduled for August 9, 2023. [*See* 07/18/2023 Entry]. On or around August 7, 2023, *i.e.*, two (2) days before the scheduled mediation, opt-in Plaintiff Michael Williams Garcia, Jr. filed a consent to sue form, and joined the pending action. Plaintiff Garcia, Jr.’s joinder necessitated an adjournment of the August 9, 2023 mediation.

In light of the foregoing, the parties require additional time to complete discovery, in the event that the virtual mediation is unsuccessful.

A second, independent basis also necessitates the instant request. The undersigned law firm has had limited availability during the month of September 2023 due to the Jewish high holidays of Rosh HaShana and Yom Kippur.

In light of the foregoing, it is respectfully requested that the Court extend the parties’ time to complete fact discovery from September 14, 2023 to, through and including, October 31, 2023.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi
60 East 42nd Street, Suite 4700
New York, NY 10165
Tel. No.: (212) 792-0048
Email: Jason@levinepstein.com
Attorneys for Plaintiffs

VIA ECF: All Counsel